

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MARIA MANIATAKIS,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 08-64
	:	
OHIO CASUALTY GROUP and	:	
WEST AMERICAN INSURANCE	:	TRIAL BY JURY OF
COMPANY,	:	TWELVE DEMANDED
	:	
Defendants.	:	

**STIPULATION TO EXTEND TIME  
FOR FILING RESPONSIVE PLEADING**

WHEREAS, the parties have respectfully requested that the Court consider an extension of the date by which Defendant's Answer to the Complaint is due in this action from February 6, 2008 to February 18, 2008;

WHEREAS, the basis for the request for an extension of time is defense counsel requires additional time in which to receive, review and analyze the initial file materials from her client, to consult with her client and to obtain the information necessary to properly respond to the allegations set forth in Plaintiff's Complaint.

WHEREAS, counsel for both parties have discussed such extension of time and counsel for the Plaintiff has no opposition to Defendant's request for an extension of time in which to respond to the Complaint.

IT IS HEREBY STIPULATED by and between the parties, subject to the approval of the Court, that the date by which Defendant must file a responsive pleading in the above matter is extended until February 18, 2008.

**BIGGS & BATTAGLIA**

**BY: /s/ Robert D. Goldberg**  
**ROBERT D. GOLDBERG, ESQUIRE**  
**I.D. No. 631**  
**921 N. Orange St.**  
**P.O. Box 1489**  
**Wilmington, DE 19899**  
**(302) 655-9677**  
**Attorney for Plaintiff,**  
**Maria Maniatakis**

Dated: 02/04/08

**MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN**

**BY: /s/ Vicki L. Goodman**  
**VICKI L. GOODMAN, ESQUIRE**  
**I.D. No. 4861**  
**1220 North Market Street, 5<sup>th</sup> Floor**  
**P.O. Box 8888**  
**Wilmington, DE 19899**  
**(302) 552-4348**  
**Attorney for Defendants,**  
**Ohio Casualty Group and West**  
**American Insurance Company**

Dated: 02/04/08

SO ORDERED this \_\_\_\_\_ of \_\_\_\_\_, 2008.

\_\_\_\_\_  
J.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

MARIA MANIATAKIS,

Plaintiff,

v.

OHIO CASUALTY GROUP and  
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Defendants.

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C.A. No. 08-64

TRIAL BY JURY OF  
TWELVE DEMANDED

**CERTIFICATE OF SERVICE**

I, Vicki L. Goodman, Esquire, hereby certify that a true and correct copy of the  
Stipulation to Extend Time for Filing Responsive Pleading were served on the below date  
via electronic filing, upon the following individuals:

Robert D. Goldberg, Esquire  
Steven F. Mones, Esquire  
BIGGS AND BATTAGLIA  
921 Orange Street  
Wilmington, DE 19801  
*Attorneys for Plaintiff*

**MARSHALL, DENNEHEY, WARNER,  
COLEMAN & GOGGIN**

BY: \_\_\_\_\_  
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(302) 552-4348  
*Attorneys for Defendants*

Dated: February 4, 2008